

DEFINITIONS

1. "COMMUNICATION(S)" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
2. "DOCUMENT(S)" is synonymous in meaning and equal in scope to the usage of this term in the Local Rules and Federal Rules of Civil Procedure, including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term. A document includes all documents appended thereto. This includes materials in the size, shape, color, and format of the original, including any annotations, highlighting, interlineations, and the like. This also includes specifically electronically stored information, including e-mails, spreadsheets, PowerPoint presentations, reports, photographs, and other images. Electronically stored information includes as well all metadata related to each document.
3. "EPA" refers to the U.S. Environmental Protection Agency.
4. "IRIS" refers to Integrated Risk Information System
5. "PCB" or "PCBs" as used herein refers to all polychlorinated biphenyl congeners and all mixtures of PCBs, including but not limited to mixtures under the "Aroclor" or "Arochlor" name.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All DOCUMENTS, CORRESPONDENCE, REPORTS and DRAFT REPORTS regarding Pamela Lien's engagement, employment and/or consultation with the EPA, its agents, employees, and/or contractors on the health effects associated with the exposure to PCBs including but not limited to the IRIS Assessment of Polychlorinated Biphenyls (PCBs).

2. All DOCUMENTS, CORRESPONDENCE, REPORTS and DRAFT REPORTS regarding Pamela Lien's engagement, employment and/or consultation with the EPA, its agents, employees, and/or contractors pertaining to A Systematic Evidence Map for Evaluation of Noncancer Health Effects and Exposures to Polychlorinated Biphenyl (PCBs) Mixtures published March 2023.
3. All DOCUMENTS, CORRESPONDENCE, REPORTS and DRAFT REPORTS regarding Pamela Lien's engagement, employment and/or consultation with the EPA, its agents, employees, and/or contractors pertaining to the developmental neurotoxicity of polychlorinated biphenyls (PCBs).